

# Exhibit 2

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>CORE SCIENTIFIC, INC., et al.</b>	§	<b>Case No. 22-90341 (DRJ)</b>
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>(Jointly Administered)</b>
	§	

**NOTICE OF RULE 30(b)(6) DEPOSITION OF THE DEBTORS**

PLEASE TAKE NOTICE that pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure made applicable to these cases through Rules 7026, 7030, and 9014 of the Federal Rules of Bankruptcy Procedure, counsel for the Official Committee of Unsecured Creditors of Core Scientific, Inc. (the “Committee”) and its related debtors and debtors in possession in the above-captioned Chapter 11 cases (collectively, the “Debtors”), will take the deposition by oral examination of the Debtors through one or more officers, directors, agents, or other representatives who shall be designated to testify on the Debtors’ behalf regarding all information known or reasonably available to the Debtors with respect to the subject matters identified in Attachment A hereto, at 1:00 PM Eastern Time on January 24, 2023, virtually via Zoom, before a notary public or other officer authorized by law to administer oaths and continuing from day to day until completed. The deposition will be recorded stenographically, and may also be recorded through audio or video means. The Committee respectfully requests that the Debtors provide written notice

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Core Scientific Mining LLC (6971); Core Scientific, Inc. (3837); Core Scientific Acquired Mining LLC (N/A); Core Scientific Operating Company (5526); Radar Relay, Inc. (0496); Core Scientific Specialty Mining (Oklahoma) LLC (4327); American Property Acquisition, LLC (0825); Starboard Capital LLC (6677); RADAR LLC (5106); American Property Acquisitions I, LLC (9717); and American Property Acquisitions, VII, LLC (3198). The Debtors’ corporate headquarters and service address is 210 Barton Springs Road, Suite 300, Austin, Texas 78704.

at least two (2) days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on the Debtors' behalf.

Dated: January 13, 2023

**WILLKIE FARR & GALLAGHER LLP**

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**PROPOSED COUNSEL FOR THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS**

**ATTACHMENT A**

1. The *Emergency Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Authorizing the Debtors to Use Cash Collateral, (C) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (D) Granting Adequate Protection to the Prepetition Secured Parties, (E) Modifying the Automatic Stay, (F) Scheduling a Final Hearing, and (G) Granting Related Relief* [Dkt. No. 38] (the “DIP Financing Motion”).
2. The negotiation, entry into, and terms of the Restructuring Support Agreement (attached as Exhibit B to *The Declaration of Michael Bros In Support of the Debtors’ Chapter 11 Petitions and First Day Relief* [Docket No. 5] (the “First Day Declaration”)).
3. The DIP Facility (as defined in the First Day Declaration) or any alternative financing proposals presented to the Debtors on or prior to December 21, 2022 (“Additional Financing”).
4. The Debtors’ view on the value of the assets securing the outstanding obligations under the Convertible Notes.
5. The type and value of assets not pledged as collateral to any lender and any liens or encumbrances on such assets.
6. The negotiation, entry into, and terms of the Senior Secured Super-Priority Debtor-In-Possession Loan and Security Agreement, dated as of December 22, 2022 (as amended, amended and restated, supplemented, or otherwise modified from time to time, the “DIP Credit Agreement”), including but not limited to sizing of new money and roll-up components, milestones, and fees, draft term sheets, and the uses of potential financing.
7. The negotiated and stipulated claim amount of the April Convertible Secured Notes.
8. Any potential merger transactions of acquisitions involving the Debtors, including any proposals or offers received (or discussed) historically and discussions regarding dual-path proposals considered as part of a restructuring.
9. The value of the Debtors’ assets as a going concern prior to, during, or upon emergence from a restructuring.
10. The value of the Debtors’ assets under the secured equipment loans and other mining assets broadly.
11. Any potential restructuring or modifications of terms and/or contracts with equipment lenders of vendors/contractors.
12. Additional Financing proposals (including access to outreach lists, feedback from parties contacted, marketing materials, dataroom access to financing process, proposals received, etc.).

13. Board and special committee presentations and other materials, and meeting minutes related to Additional Financing or the process of soliciting bids for any Additional Financing.
14. All lien searches conducted by the Debtors prior to the Petition Date (as defined in the First Day Declaration).
15. All 13-week cash flow forecasts prepared by the Debtors.
16. The Debtors' forecast, including the rationales for key assumptions reflected therein, (e.g. payroll, R&D, SG&A, chapter 11 fees, bitcoin prices, projected power costs).